

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

IN RE SONUS NETWORKS, INC.
SHAREHOLDER DERIVATIVE LITIGATION

Case No. 1-04-CV-10359 DPW

Consolidated Cases:
1-04-CV-10359 DPW; 1-04-CV-10384 DPW; 1-04-
CV-10576 DPW

**JOINT MOTION TO SET BRIEFING
SCHEDULE FOR DEFENDANTS' RESPONSE
TO CONSOLIDATED SHAREHOLDER
DERIVATIVE COMPLAINT**

The parties hereby move jointly to set a briefing schedule for the defendants' response to the Consolidated Shareholder Derivative Complaint (the "Consolidated Complaint"), filed on October 12, 2004. As grounds for this joint motion, the parties state as follows:

1. The defendants are currently scheduled to respond to the Consolidated Complaint by November 26, 2004;
2. No dates have previously been scheduled for submission of opposition or reply briefs;
3. No party has previously requested an extension of any deadlines in this action;
and
4. Counsel for the parties have conferred in good faith regarding scheduling matters, taking into account the Thanksgiving and year-end holidays, with an eye towards prompt resolution of any issues that may be raised in response to the Consolidated Complaint,

WHEREFORE, in order to accommodate the schedules of counsel, the parties hereby respectfully request that the Court establish the following briefing schedule in connection with defendants' response to the Consolidated Complaint:

1. Defendants' response shall be filed on December 3, 2004.
2. Plaintiffs' opposition brief shall be filed on January 21, 2005.
3. Defendants' reply brief shall be filed on February 11, 2005.

Respectfully submitted,

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Dated: November 17, 2004